

## Inspection Notes

TO: Multi-Service File

FROM: Cathy Altman

DATE: November 23, 2010

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Carson Cockayne (Dayton Fire Department), Dave Combs (OSI), Tom Ontko and I inspected the facility on November 23, 2010. Thomas Noland (Attorney for Mel Tatman) provided access to the building and represented Multi-Service during the inspection. The purpose of the inspection was to determine the condition of containers and tanks inside and outside of the facility.

### Tank Room:

- Dirty Solvent tank (12,185 gallon capacity) appears to have the same level of waste inside, as judged by the sight glass – approximately 1,000 gallons of waste.
- Clean Solvent tank (12,185 gallon capacity) appears empty, as judged by the sight glass
- Used Oil tank (3,800 gallon capacity), contents unknown
- Sludge Cooling Tank (300 gallon capacity), contents unknown
- Clean Solvent Receiver Tank (1,268 gallon capacity) – since March 12, 2010, inspection amount of waste in tank has decreased, as judged by sight glass, by approximately 200-300 gallons. It is not clear whether someone drained the waste from the tank or if the tank leaked. The waste collected in the floor sump.
- Sump pit and pump (400 gallon capacity) – was approximately half full during the March 12, 2010, inspection but now is filled to the top with waste, presumably from the Clean Solvent Receiver Tank.
- Tank Vent carbon absorption unit – size unknown
- Secondary water/solvent separator (400 gallons) mostly empty

The trenching system under the laundry equipment appears to have the same amount of waste and debris.

## Laundering Process:

- Tank, black bottom with gray/white top (approximately 4,000 gallon capacity) was  $\frac{3}{4}$  full during March 12, 2010, inspection, appears empty now

There were ten (10) trucks on site, three (3) trailers and seven (7) box trucks. This is one less box truck than during the March 12, 2010, inspection but I believe it was sold to Absorbtech. The one trailer (number 54) was opened during the inspection and contained dirty rags, a strong solvent odor was emanating from the interior of the trailer.

During the March 12, and June 4, 2010, inspections 54 drums containing dirty rags were stored outside southwest of the building. These drums are no longer stored in this location. It is unclear whether these drums were moved into a truck or if they were removed from the site.

It appears that Absorbtech is no longer using the facility to store their laundry materials. However, there are still containers of rags throughout the facility.

One hazardous waste tote (approximately  $\frac{1}{4}$  full) dated March 9, 2010, is stored in front of the waste water treatment unit. As of November 23, 2010, the hazardous waste tote is 169 days beyond the 90-day storage limit.

Multi-Service ceased operations on March 5, 2010. Multi-Service had 90 days to remove waste from any process units (June 3, 2010). The Equalization tank #2 and the floor sump associated with the waste water treatment unit (WWTU) are known to contain hazardous waste based on analysis. The dirty solvent tank, the clean solvent receiver tank and the floor sump in the tank room are considered to contain hazardous waste based on generator knowledge. Multi-Service failed to remove the hazardous waste causing the units to be classified as hazardous waste storage tanks. As a large quantity generator, Multi-Service had another 90 days to store the hazardous waste in the hazardous waste tanks (September 1, 2010). Multi-Service failed to ship the waste offsite within the 90 day storage limit. As of November 23, 2010, the hazardous wastes in the Equalization tank #2, the floor pit associated with the WWTU, the dirty solvent tank, the clean solvent receiver tank and the floor sump in the tank room have been illegally stored for eighty-three (83) days.